

LIPSON NEILSON P.C.
JOSEPH P. GARIN, ESQ.
Nevada Bar No. 6653
LISA J. ZASTROW, ESQ.
Nevada Bar No. 9727
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
(702) 382-1500 - Telephone
(702) 382-1512 - Facsimile
jgarin@lipsonneilson.com
lzastrow@lipsonneilson.com

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ISABEL IBARRA,

Plaintiff,

vs.

CENTURY SECURITY MANAGEMENT
OF LAS VEGAS CORP., a Nevada Domestic
Corporation; DOES 1 through 10; and ROE
BUSINESS ENTITIES 1 through 10,
inclusive,

Defendants.

CASE NO.: 2:18-cv-01706-MMD-VCF

**NOTICE OF SETTLEMENT AND
STIPULATION AND ORDER TO STAY**

(first request)

Plaintiff, ISABEL IBARRA (“Plaintiff”) and Defendant, CENTURY SECURITY
MANAGEMENT OF LAS VEGAS CORP (“Defendant”), by and through their respective
counsel, respectfully advise this court that a settlement has been reached among the parties
during private mediation.

WHEREFORE, the parties agree and stipulate as follows:

1. The current deadline to file the Pre-Trial Memorandum is currently today, **May
17, 2021.**

2. Finalizing the settlement has taken much longer than anticipated due to
accounting resolution and other confidential matters, but the parties believe in good faith that the

1 settlement should be fully complete within fourteen (14) days.

2 3. Thus, the parties are seeking a stay of this matter for fourteen (14) days in which
3 to complete the settlement and fully expect that prior to the expiration of that time the parties
4 anticipate filing a stipulation and order dismissing this matter.

5 4. Thus this matter should be stayed until Monday, May 31, 2021. But because of
6 the date falling on a Court Holiday (Memorial Day) the new date should be **June 1, 2021**.

7 5. Should the settlement not be concluded during that time, the Plaintiff reserves the
8 right to seek assistance from the Court to enforce the agreement of the parties.

9 IT IS SO STIPULATED.

10 Dated this 17th day of May, 2021
11 KEMP & KEMP

12 By: /s/ James P. Kemp
13 JAMES P. KEMP, ESQ.
14 7435 W. Azure Drive, Suite 110
15 Las Vegas, Nevada 89130

16 -and-

17 KEVIN A. SPRENZ, ESQ.
18 SPRENZ LAW
19 9960 W. Cheyenne Avenue #170
20 Las Vegas, NV 89129
21 *Attorneys for Plaintiff, Isabel Ibarra*

Dated this 17th day of May, 2021
LIPSON NEILSON P.C.

By: /s/ Lisa J. Zastrow
JOSEPH P. GARIN, ESQ. (NV Bar No. 6653)
LISA J. ZASTROW, ESQ. (NV Bar No. 9727)
9900 Covington Cross Drive, Suite 120
Las Vegas, Nevada 89144
Attorneys for Defendant
Century Security Management of Las Vegas
Corp.

Ibarra v. Century Security Management of Las Vegas

Case No. 2:18-cv-01706-MMD-VCF

ORDER

Based on the foregoing stipulation, and good cause appearing therefore,

IT IS SO ORDERED.

DATED: 5-17-2021


UNITED STATES MAGISTRATE JUDGE